

REMARKS

This Amendment amends Claims 87 and 88, and adds Claims 97-105.

Claims 87 and 88 were originally rejected based on EP 0 311 189 (EP '189) in an Office Action dated September 10, 2003 and distinguished by applicants in an Amendment filed on February 12, 2004. Subsequently, U.S. Patent No. 4,076,384 (the '384 patent) was reviewed and it was noted that this reference discloses a lens matrix associated with a Fresnel lens.<sup>1</sup>

By the above amendment, Claims 87 and 88 have been amended to specify that "at least some of the microstructures" called for by those claims "have a configuration that is characterized by at least one predetermined parameter which is randomly distributed in accordance with a predetermined probability density function." Support for this limitation can be found throughout applicants' specification (see, for example, page 10, lines 3-9). Neither EP '189 cited in the September 10, 2003 Office Action nor the '384 patent has any disclosure regarding randomized microstructures.

In addition to the foregoing amendments to Claims 87 and 88, applicants have also added independent Claims 97 and 100 to the application, which are modified versions of independent Claims 87 and 88 designed to provide further protection for applicants' invention. Claims 97 and 100 each call for a "plurality of microstructures" which has "an arrangement which is not rotationally symmetric." Support for this limitation can be found throughout applicants' specification (see, for example, applicants' Screen Design Tables). The '384 patent does not disclose or suggest such an arrangement.

---

<sup>1</sup> The '384 patent is Reference 78 of applicants' August 16, 2004 Modified PTO 1449 Form.

As to EP '189, in addition to requiring an arrangement of microstructures which is "not rotationally symmetric," Claim 97 also specifies that the microlens referred to in that claim is a "non-cylindrical" microlens, i.e., Claim 97 includes the same limitation that applicants included in Claim 87 to distinguish EP '189 in their Amendment filed on February 12, 2004. As discussed in that Amendment, support for the non-cylindrical microlens limitation can be found throughout applicants' specification (see, for example, applicants' Screen Design Tables).

As discussed in the February 12<sup>th</sup> Amendment, column 5, lines 35-38, of EP '189 describe a structure having "a multiple of cylindrical lenses arranged on Fresnel facets of the first Fresnel structure and extending in the same direction as said Fresnel facets" (emphasis added; see also Figures 3 and 4 of EP '189). Nowhere in the reference is there any disclosure or suggestion of non-cylindrical lenses. Accordingly, applicants respectfully submit that EP '189 does not disclose or suggest Claim 97.

As to added independent Claim 100, in addition to requiring an arrangement of microstructures which is "not rotationally symmetric," that claim calls for "a Fresnel lens which comprises a plurality of surfaces in the form of concentric rings" (emphasis added). As discussed in the February 12<sup>th</sup> Amendment, EP '189, on the other hand, only discloses "linear Fresnel structures" (see, for example, lines 3-4 of the abstract of EP '189). Accordingly, as with Claim 97, applicant believes that Claim 100 is properly patentable in view of EP '189.

In addition to amending independent Claims 87 and 88, and adding independent Claims 97 and 100, various dependent claims have been added to provide further protection for applicants' invention, i.e., dependent Claims 98-99 and 101-104. In particular, dependent Claims 98 and 101 combine the random distribution requirement of Claims 87 and 88 with the

non-rotationally symmetric requirement of independent Claims 97 and 100, while dependent Claims 99 and 102-104 add a 100% fill factor limitation to each of independent Claims 87, 88, 97, and 100. Support for this limitation can be found throughout applicants' specification (see, for example, page 16, lines 4-10).

Submitted herewith is a copy of U.S. Patent No. 6,429,919 (the '919 patent) which shows a randomized array of microstructures. Although applicants believe that Claim 89 as currently written distinguishes the '919 patent, to provide an additional level of protection for this aspect of their invention, dependent Claim 105 is being added by this amendment. This added claim specifies that the plurality of microstructures called for by Claim 89 has a 100 percent fill factor. Support for this limitation can be found throughout applicants' specification (see, for example, page 16, lines 4-10).

Consideration of the foregoing in connection with the continued examination of this application is respectfully requested.

Respectfully submitted,

Date: 9/29/04

Maurice Klee

Maurice M. Klee, Ph.D.  
Reg. No. 30,399  
Attorney for Applicant  
1951 Burr Street  
Fairfield, CT 06824  
(203) 255-1400